

1 DURIE TANGRI LLP  
2 SONAL N. MEHTA (SBN 222086)  
3 smehta@durietangri.com  
4 JOSHUA H. LERNER (SBN 220755)  
5 jlerner@durietangri.com  
6 LAURA E. MILLER (SBN 271713)  
7 lmiller@durietangri.com  
8 CATHERINE Y. KIM (SBN 308442)  
9 ckim@durietangri.com  
10 ZACHARY G. F. ABRAHAMSON (SBN 310951)  
11 zabrahamson@durietangri.com  
12 217 Leidesdorff Street  
13 San Francisco, CA 94111  
14 Telephone: 415-362-6666  
15 Facsimile: 415-236-6300

16 Attorneys for Defendants  
17 Facebook, Inc., Mark Zuckerberg, Christopher Cox, Javier  
18 Olivan, Samuel Lessin, Michael Vernal, and Ilya Sukhar

19 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
20 COUNTY OF SAN MATEO

21 SIX4THREE, LLC, a Delaware limited liability  
22 company,

23 Plaintiff,

24 v.

25 FACEBOOK, INC., a Delaware corporation;  
26 MARK ZUCKERBERG, an individual;  
27 CHRISTOPHER COX, an individual;  
28 JAVIER OLIVAN, an individual;  
MICHAEL VERNAL, an individual;  
ILYA SUKHAR, an individual; and  
DOES 1-50, inclusive,

Defendants.

Case No. CIV 533328

Assigned for all purposes to Hon. V. Raymond  
Swope, Dept. 23

**DECLARATION OF ZACHARY G.F.  
ABRAHAMSON IN SUPPORT OF  
DEFENDANT FACEBOOK, INC.'S MOTION  
TO SEAL**

Date: July 19, 2019  
Time: 2:00 p.m.  
Dept: 23 (Complex Civil Litigation)  
Judge: Honorable V. Raymond Swope

FILING DATE: April 10, 2015  
TRIAL DATE: April 25, 2019

1 I, Zachary G.F. Abrahamson, declare as follows:

2 1. I am a lawyer with the law firm Durie Tangri LLP, counsel of record for Defendant  
3 Facebook, Inc. ("Facebook") in the above-captioned matter. I provide this declaration in support of  
4 Facebook's Motion to Seal. I declare that the following statements are true to the best of my knowledge,  
5 information, and belief, formed after a reasonable inquiry under the circumstances. If called upon to  
6 testify, I could and would competently testify thereto.

7 2. Exhibits 1 and 2 to the Declaration of Zachary G.F. Abrahamson in Support of Defendant  
8 Facebook, Inc.'s *Ex Parte* Application for an Order Shortening Time for Depositions contain summaries  
9 of information contained in documents Facebook designated as confidential or highly confidential under  
10 the Protective Order. These summaries mischaracterize and misrepresent the underlying documents, but  
11 nevertheless describe protected information from Facebook's confidential and highly confidential  
12 documents, such as internal business discussions about possible business policies and business plans.  
13 The disclosure of this information would harm Facebook's business.

14 I declare under the penalty of perjury that the foregoing is true and correct. Executed this 17th  
15 day of April, 2019, in San Francisco, California.

16  
17   
18 ZACHARY G. F. ABRAHAMSON  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I am employed in San Francisco County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is 217 Leidesdorff Street, San Francisco, CA 94111.

On April 17, 2019, I served the following documents in the manner described below:

**DECLARATION OF ZACHARY G.F. ABRAHAMSON IN SUPPORT OF  
DEFENDANT FACEBOOK, INC.'S MOTION TO SEAL**

BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Durie Tangri's electronic mail system from [zabrahamson@durietangri.com](mailto:zabrahamson@durietangri.com) to the email addresses set forth below.

On the following part(ies) in this action:

Stuart G. Gross  
**GROSS & KLEIN LLP**  
The Embarcadero, Pier 9, Suite 100  
San Francisco, CA 94111  
[sgross@grosskleinlaw.com](mailto:sgross@grosskleinlaw.com)

David S. Godkin  
James Kruzer  
BIRNBAUM & GODKIN, LLP  
280 Summer Street  
Boston, MA 02210  
[godkin@birnbaumgodkin.com](mailto:godkin@birnbaumgodkin.com)  
[kruzer@birnbaumgodkin.com](mailto:kruzer@birnbaumgodkin.com)

*Attorneys for Plaintiff  
Six4Three, LLC*

Donald P. Sullivan  
Wilson Elser  
525 Market Street, 17th Floor  
San Francisco, CA 94105  
[donald.sullivan@wilsonelser.com](mailto:donald.sullivan@wilsonelser.com)  
[Joyce.Vialpando@wilsonelser.com](mailto:Joyce.Vialpando@wilsonelser.com)  
[Dea.Palumbo@wilsonelser.com](mailto:Dea.Palumbo@wilsonelser.com)

*Attorney for Gross & Klein LLP*

Jack Russo  
Christopher Sargent  
ComputerLaw Group, LLP  
401 Florence Street  
Palo Alto, CA 94301  
[jrusso@computerlaw.com](mailto:jrusso@computerlaw.com)  
[csargent@computerlaw.com](mailto:csargent@computerlaw.com)  
[ecf@computerlaw.com](mailto:ecf@computerlaw.com)

*Attorney for Theodore Kramer and Thomas Scaramellino (individual capacities)*

Steven J. Bolotin  
Morrison Mahoney LLP  
250 Summer Street  
Boston, MA 02210  
[sbolutin@morrisonmahoney.com](mailto:sbolutin@morrisonmahoney.com)  
[Llombard@morrisonmahoney.com](mailto:Llombard@morrisonmahoney.com)

James A. Murphy  
James A. Lassart  
Thomas P Mazzucco  
Joseph Leveroni  
Murphy Pearson Bradley & Feeney  
88 Kearny St, 10th Floor  
San Francisco, CA 94108  
[JMurphy@MPBF.com](mailto:JMurphy@MPBF.com)  
[jlassart@mpbf.com](mailto:jlassart@mpbf.com)  
[TMazzucco@MPBF.com](mailto:TMazzucco@MPBF.com)  
[JLeveroni@MPBF.com](mailto:JLeveroni@MPBF.com)

*Attorney for Birnbaum & Godkin, LLP*

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed on April 17, 2019, at San Francisco, California.

3   
4 ZACHARY G.F. ABRAHAMSON

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28